

EXHIBIT “D”

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

JENNIFER P. SCHWEICKERT,

Plaintiff,

No. 13-CV-675

v.

**CORPORATE DISCLOSURE
STATEMENTS OF DEFENDANTS
HUNTS POINT VENTURES, INC.
AND HUNTS POINT VENTURE
GROUP, LLC**

HUNTS POINT VENTURES, INC; HUNTS
POINT VENTURE GROUP, LLC; CHAD
RUDKIN and ELIZABETH RUDKIN, and
their marital community comprised thereof;
JOHN DU WORS, and DOES 1-4;

Defendants.

HUNTS POINT VENTURES, INC.

Pursuant to Federal Rule of Civil Procedure 7.1 and Local Rules W.D. Wash. LCR 7.1, Defendant Hunts Point Ventures, Inc. ("HPV") states that it has no parent company and that no publicly traded corporation owns 10 percent or more of its stock.

HUNTS POINT VENTURE GROUP, LLC

Pursuant to Federal Rule of Civil Procedure 7.1 and Local Rules W.D. Wash. LCR 7.1, Defendant Hunts Point Venture Group, LLC ("HPVG") states that it is an INACTIVE company, has no parent company, and no publicly traded corporation owns 10 percent or more of its stock.

Defendant HPVG further states that, while active, it had the following members:

1. Steven Schweickert

CORPORATE DISCLOSURE STATEMENTS OF
DEFENDANTS HUNTS POINT VENTURES, INC.
AND HUNTS POINT VENTURE GROUP, LLC - 1
Case No. 13-CV-675

FOSTER PEPPER PLLC
1111 THIRD AVENUE, SUITE 3400
SEATTLE, WASHINGTON 98101-3299
PHONE (206) 447-4400 FAX (206) 447-9700

DATED this 9th day of September, 2013.

FOSTER PEPPER PLLC

/s/ Joel B. Ard

Joel B. Ard, WSBA No. 40104
Rylan L.S. Weythman, WSBA No. 45352
1111 Third Avenue, Suite 3400
Seattle, WA 98101-3299
Telephone: (206) 447-4400
Facsimile: (206) 447-9700
ardjb@foster.com
weytr@foster.com

Attorneys for Defendants Hunts Point
Ventures, Inc. and Hunts Point Venture
Group, LLC

CERTIFICATE OF SERVICE

I, Joel B. Ard, state that I am a citizen of the United States of America and a resident of the State of Washington, I am over the age of twenty one years, I am not a party to this action, and I am competent to be a witness herein. The foregoing has been electronically filed with the Clerk of the Court using the CM/ECF System, who will electronically send notification of such filing to all parties who have appeared in this action as of today's date.

There are no other parties who have appeared in this action as of today's date that need to be served manually.

I DECLARE under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

DATED this 9th day of September, 2013.

/s/ Joel B. Ard

Joel B. Ard

The Honorable Ricardo. S. Martinez

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

JENNIFER P. SCHWEICKERT,)	
)	
Plaintiff,)	No. 13-CV-675
)	
v.)	DEFENDANTS CHAD AND
)	ELIZABETH RUDKIN'S INITIAL
HUNTS POINT VENTURES, INC.; HUNTS)	DISCLOSURES PURSUANT TO FED. R.
POINT VENTURE GROUP, LLC; CHAD and)	CIV. P. 26(a)(1)
ELIZABETH RUDKIN, and their marital)	
community comprised thereof; JOHN DU)	
WORS and AMBER DU WORS, and their)	
marital community comprised thereof; and)	
DOES 1-4,)	
)	
Defendants.)	

Defendants Chad and Elizabeth Rudkin ("Rudkin") hereby make the following Initial Disclosures as required by Federal Rule of Civil Procedure 26(a)(1) and the Order Regarding Initial Disclosures, Joint Status Report, and Early Settlement (Docket No. 4) as amended by the order resetting deadlines dated July 2, 2013, which extended the date to file disclosures.

I. POTENTIAL WITNESSES

The following is a list, as required by Rule 26(a)(1)(A)(i), of currently known individuals likely to have discoverable information that Rudkin may use to support claims or defenses.

1. Chad Rudkin. Mr. Rudkin is an officer in Hunts Point and assisted Mr. Phillips during the Phillips Litigation. He has knowledge regarding relevant facts of this case. Mr. Rudkin may be contacted through his counsel, Foster Pepper, LLC, 1111 Third Avenue, Suite 3400, Seattle, WA 98101, (206) 447-4400.

RUDKINS FRCP 26 INITIAL DISCLOSURES- 1
Case No. 13-CV-675

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2. Elizabeth Rudkin. Ms. Rudkin is an employee of Hunts Point and assisted Mr. Phillips during the Phillips Litigation. She has knowledge regarding relevant facts of this case. Ms. Rudkin may be contacted through her counsel, Foster Pepper, LLC, 1111 Third Avenue, Suite 3400, Seattle, WA 98101, (206) 447- 4400.
3. Jennifer Schweickert. Ms. Schweickert is the plaintiff in this case. She has knowledge regarding relevant facts of her claim including the alleged promissory note, the negotiations leading up to its execution and Hunts Point's efforts to pursue patent litigation. Ms. Schweickert may be contacted through her counsel, Mr. Reed Yurchak, 40 Lake Bellevue Drive, Suite 100, Bellevue, WA 98005, (425) 941-6659.
4. Joyce Schweickert. Based upon information and belief, Ms. Joyce Schweickert was involved in discussion regarding the formation of Hunts Point. She has knowledge regarding relevant facts of this case. Ms. Schweickert's current contact information is not known and will be supplemented.
5. Steven Schweickert. Based upon information and belief, Mr. Schweickert was involved in discussion regarding the formation of Hunts Point. He has knowledge regarding relevant facts of this case. Mr. Schweickert's current contact information is not known and will be supplemented.
6. Mark Phillips. Based upon information and belief, Mr. Phillips was involved in discussions regarding the formation of Hunts Point. He has knowledge regarding relevant facts of this case. Mr. Phillips' current contact information is not known and will be supplemented.
7. John DuWors. Mr. DuWors is a defendant in this case who represented Hunts Point Ventures, Inc. ("Hunts Point") in various patent prosecutions and defended Mark Phillips in various civil and criminal proceedings (the "Phillips Litigation"). He has knowledge regarding relevant facts of this case. Mr. DuWors may be contacted through his counsel, Lee Smart, P.S., Inc., 1800 One Convention Place, 701 Pike Street, Seattle, WA 98101, (206) 624-7990.
8. Michael Spain. Mr. Spain represented Hunts Point in various patent prosecutions. He has knowledge regarding relevant facts of this case. Mr. Spain may be contacted through his counsel, Lee Smart, P.S., Inc., 1800 One Convention Place, 701 Pike Street, Seattle, WA 98101, (206) 624-7990.
9. Derek Linke. Mr. Linke represented Hunts Point in various patent prosecutions. He has knowledge regarding relevant facts of this case. Mr. Linke may be contacted through his counsel, Lee Smart, P.S., Inc., 1800 One Convention Place, 701 Pike Street, Seattle, WA 98101, (206) 624-7990.
10. John Whittaker. Mr. Whittaker represented Hunts Point in various patent prosecutions. He has knowledge regarding relevant facts of this case. Mr. Whittaker may be contacted through his counsel, Lee Smart, P.S., Inc., 1800 One Convention Place, 701 Pike Street, Seattle, WA 98101, (206) 624-7990.
11. Matt Troncali. Mr. Troncali represented Hunts Point in various patent prosecutions. He has knowledge regarding relevant facts of this case. Mr. Troncali

may be contacted through his counsel, Lee Smart, P.S., Inc., 1800 One Convention Place, 701 Pike Street, Seattle, WA 98101, (206) 624-7990.

12. Kenneth Gordon. Based upon information and belief, Mr. Gordon was involved in discussions regarding the formation of Hunts Point. He has knowledge regarding relevant facts of this case. Mr. Gordon's current contact information is not known and will be supplemented.
13. Douglas Lower. Based upon information and belief, Mr. Lower was involved in discussions regarding the formation of Hunts Point. He has knowledge regarding relevant facts of this case. Mr. Lower's current contact information is not known and will be supplemented.
14. Anthony Bay. Mr. Bay was involved in negotiations regarding the Phillips Litigation, including the assignment of Mr. Phillips' intellectual property. He has knowledge regarding relevant facts of this case. Mr. Bay's current contact information is not known and will be supplemented.
15. Representative of Hunts Point Ventures, Inc. Hunts Point is the party who executed the promissory note at issue in the complaint and pursued violations of Mr. Phillips' intellectual property. Its corporate representative will have knowledge regarding relevant facts of this case. The representative may be contacted through its counsel, Foster Pepper, LLC, 1111 Third Avenue, Suite 3400, Seattle, WA 98101, (206) 447-4400.
16. Representative of Hunts Point Venture Group, LLC. Hunts Point Venture Group, LLC is the entity in which plaintiff alleges she was to have received an equity participation. Its corporate representative will have knowledge regarding relevant facts of this case. The representative may be contacted through its counsel, Foster Pepper, LLC, 1111 Third Avenue, Suite 3400, Seattle, WA 98101, (206) 447-4400.
17. Representative of the Estate of Robert Arnold. Mr. Arnold, and later his estate, was involved in negotiations regarding the Phillips Litigation. The estate has knowledge regarding relevant facts of this case. The estate's current contact information is not known and will be supplemented.
18. Representative of MOD Systems, Inc. MOD Systems, Inc. was involved in negotiations regarding the Phillips Litigation, including the assignment of Mr. Phillips' intellectual property. MOD Systems, Inc. has knowledge regarding relevant facts of this case. MOD Systems, Inc. is currently an inactive corporation. Its registered agent is Derek De Bakker, 1301 Second Avenue, Ste. 501, Seattle, WA 98101.
19. All witnesses listed by the other parties to this lawsuit; and
20. Additional witnesses, the identities of whom are learned through further discovery, investigation, and trial preparation.

II. DESCRIPTION OF DOCUMENTS, DATA, AND TANGIBLE THINGS

The following is a description by category, as required by Rule 26(a)(1)(A)(ii), of all currently known documents, data compilations, and tangible things that Rudkin may use to support claims or defenses. These documents are available at the offices of Rudkin's attorneys, Foster Pepper, PLLC. Rudkin reserves the right to supplement this disclosure with additional documents as may be required by further developments, investigation, discovery and/or amendment.

1. The Promissory Note and Joint Participation Agreement, dated April 21, 2011
2. Formation documents for Hunts Point Ventures, Inc.
3. Formation documents for Hunts Point Ventures Group, LLC
4. Corporate resolutions, notices, and annual minutes of Hunts Point Ventures, Inc.
5. Assignments of Phillips' intellectual property to Hunts Point Ventures, Inc.
6. Hunts Point Ventures, Inc. patent litigation documents
7. Hunts Point Ventures, Inc. accounting and business records
8. Hunts Point Ventures, Inc. legal bills

III. COMPUTATION OF CLAIMED DAMAGES

It is the position of Rudkin that there are no damages to the Plaintiff in this case and Rudkin does not seek any damages at this time.

IV. INSURANCE AGREEMENT

Rudkin is not aware of any applicable insurance agreement that may be liable to satisfy all or part of any judgment entered in this matter.

V. CONCLUSION

Rudkin makes these initial disclosures based on the information reasonably available to it at this state of the proceedings and without waiver of any rights to provide or use additional information, documents, or disclosures that may become available during the litigation. Rudkin will timely supplement this disclosure upon identification of other information.

1 DATED this 3d day of September, 2013.

2 FOSTER PEPPER PLLC

3
4 s/s Joel B. Ard

5 Joel B. Ard, WSBA No. 40104
6 *Attorneys for Defendants*
7 *Chad and Elizabeth Rudkin*

8 1111 Third Avenue, Suite 3400
9 Seattle, WA 98101
10 Tel: 206-447-6252
11 Fax: 206-749-2063
12 Email: ardjb@foster.com

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RUDKINS FRCP 26 INITIAL DISCLOSURES- 5
Case No. 13-CV-675

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SEATTLE, WASHINGTON 98101-3299
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CERTIFICATE OF SERVICE

I, Joel B. Ard, state that I am a citizen of the United States of America and a resident of the State of Washington, I am over the age of twenty one years, I am not a party to this action, and I am competent to be a witness herein. I electronically served the foregoing Initial Disclosures to counsel for all parties of record:

- **Reed Yurchak** – yurchaklaw@gmail.com
- **A. Janay Ferguson** – ajf@leesmart.com

There are no other parties who have appeared in this action as of today's date that need to be served manually.

I DECLARE under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

DATED this 3d day of September, 2013.

/s/ Joel B. Ard
Joel B. Ard

CERTIFICATE OF SERVICE
Case No. 13-CV-675

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SEATTLE, WASHINGTON 98101-3299
PHONE (206) 447-4400 FAX (206) 447-9700